

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

**UNITED STATES OF AMERICA,**

***PLAINTIFF,***

**v.**

**THE STATE OF TEXAS; GREG ABBOTT IN  
HIS OFFICIAL CAPACITY AS GOVERNOR OF  
TEXAS; TEXAS DEPARTMENT OF PUBLIC  
SAFETY; STEVEN C. McCRAW, IN HIS  
OFFICIAL CAPACITY AS DIRECTOR OF  
TEXAS DEPARTMENT OF PUBLIC SAFETY,**

***DEFENDANTS.***

**CASE NO. 1:24-CV-00008-RP**

**DEFENDANTS' UNOPPOSED MOTION FOR A STAY  
OF THEIR DEADLINE TO RESPOND TO THE COMPLAINT**

Defendants respectfully request a stay of their deadline to file a response to the complaint in this case, which would otherwise be due January 26, 2023, until 30 days after the Court rules on Plaintiff's pending Motion for Preliminary and Permanent Injunction (ECF No. 14). Defendants have conferred with Plaintiff concerning this motion, and it is unopposed.

Good cause exists for such a stay. The Court's resolution of Plaintiff's Motion for Preliminary and Permanent Injunction is likely to substantially affect subsequent proceedings in this litigation. Accordingly, extending the time for Defendants to answer or otherwise respond until 30 days after the Court resolves that motion will likely conserve the Parties' and the Court's resources. No previous extensions have been sought or granted. A proposed order is attached.

Date: January 19, 2024

Respectfully submitted.

**KEN PAXTON**  
Attorney General

/s/Ryan D. Walters  
**RYAN D. WALTERS**  
Chief, Special Litigation Division  
Tex. State Bar No. 24105085

**BRENT WEBSTER**  
First Assistant Attorney General

**DAVID BRYANT**  
Special Counsel  
Tex. State Bar No. 03281500

**GRANT DORFMAN**  
Deputy First Assistant Attorney General

**MUNERA AL-FUHAID**  
Special Counsel  
Tex. State Bar No. 24094501

**RALPH MOLINA**  
Deputy Attorney General for Legal Strategy

**HEATHER L. DYER**  
Special Counsel  
Tex. State Bar No. 24123044

**JACOB E. PRZADA**  
Special Counsel  
Tex. State Bar No. 24125371

OFFICE OF THE ATTORNEY GENERAL OF TEXAS  
Special Litigation Division  
P.O. Box 12548, Capitol Station  
Austin, Texas 78711-2548  
Tel.: (512) 463-2100  
Ryan.Walters@oag.texas.gov  
David.Bryant@oag.texas.gov  
Munera.Al-fuhaid@oag.texas.gov  
Heather.Dyer@oag.texas.gov  
Jacob.Przada@oag.texas.gov

**COUNSEL FOR DEFENDANTS**

**CERTIFICATE OF CONFERENCE**

I certify that I conferred via telephone and e-mail with Stephen Ehrlich, counsel for Plaintiff, on January 17, 2024, and he informed me that Plaintiff does not oppose this motion.

/s/ Ryan D. Walters  
RYAN D. WALTERS

**CERTIFICATE OF SERVICE**

On January 19, 2024, this document was filed electronically through the Court's CM/ECF system, which automatically serves all counsel of record.

/s/ Ryan D. Walters  
RYAN D. WALTERS